

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR
PUERTO RICO**

As representative of

**THE COMMONWEALTH OF PUERTO RICO,
et al.,**

**PROMESA Title III
No. 17 BK 3283-LTS**

(Jointly Administered)

**This filing relates to HTA and
ERS**

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SAN JUAN, P.R.

**MOTION SUPPLEMENTING PROOF OF CLAIM AND IN OPPOSITION TO THIRTY
NINTH OMNIBUS OBJECTION**

TO THE HONORABLE COURT:

HEREIN appears claimant **Rafael F. Castro-Lang** and most respectfully prays and requests:

1- On 06/06/2019 the Financial Oversight and Management Board of P.R. as representative of the Commonwealth of P.R. filed a Thirty-Ninth Omnibus Objection (Docket 7248) requesting the dismissal of petitioners \$40,000.00 claim for bonds (Exh. 1), purchased in the Employees Retirement System because it was deficient. The deficiency claimed was that the proof of claim filed failed to include supporting documents so debtors are unable to determine whether he has a valid claim against ERs or any other Title III debtors. (Exh. 2).

2- Claimant filed 4 proof of claims against the Commonwealth of P.R. and by inadvertence failed to include in this particular Proof of Claim the supporting documents that verified this purchase. In all other three proof of claims the document attached as Exh. 3 was included that identified as one of claimants bonds the \$40,000.00 of Employee Retirement Bonds purchased. Since the Board has copies of said three other proof of claims where the verification of

the purchase of these bonds was included its allegation that it was not put on notice about the legitimacy of the claim is spurious.

3- To correct this inadvertent omission claimant requests that the Court accept his UBS statement of May, 2019 (Exh. 4), where the Purchase of \$40,000.00 in Employee Retirement System Bonds appears. Exh. 3, which is already in possession of debtors in the other proof of claims filed by Rafael F. Castro-Lang also corroborates said ownership and debt.

4- With said documentation claimant has corrected the alleged deficiency and the same should be honored.

WHEREFORE it is respectfully requested that the Court allow claimant Rafael Castro-Lang to supplement his original Proof of Claim with the documentation herein attached that demonstrates the legitimacy of his \$40,000.00 purchase of Employee Retirement Bonds and deny the objection raised by Debtor.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 12th day of June, 2019.



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